

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

IN RE
Mining Project Wind Down Holdings,
Inc.

DEBTOR

§
§
§
§

Case No. 22-90273 (MI)

Chapter 11

**SUPPLEMENT TO MOTION OF RELM INSURANCE LTD. AND
BANYAN RISK LTD. TO LIFT STAY TO PERMIT PROCEEDS OF
INSURANCE TO PAY DEFENSE COSTS RELATING TO
OFFICER AND DIRECTOR LIABILITY CLAIMS**

Relm Insurance Ltd. and Banyan Risk Ltd. file this Supplement to their Motion to Lift Stay to Permit Proceeds of Insurance to Pay Defense Costs Relating to Officer and Director Liability Claims to replace Exhibit A with the attached Exhibit "B," list of outstanding attorney's fees and expenses to date.

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Bennett G. Fisher

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**ATTORNEYS FOR RELM
INSURANCE, LTD. AND BANYAN
RISK, LTD**

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of January 2025, a true and correct copy of the foregoing document was served by electronic transmission upon all parties eligible to receive service through this Court's CM/ECF system.

/s/ Bennett G. Fisher
Bennett G. Fisher